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Attorneys for Defendant Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

20 | GOOGLE LLC,

Case No. 3:20-cv-06754-WHA

Plaintiff,

**DECLARATION OF GEOFFREY MOSS
IN SUPPORT OF SONOS, INC.'S
MOTION FOR LEAVE TO AMEND
INFRINGEMENT CONTENTIONS
PURSUANT TO PATENT L.R. 3-6**

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23 | SONOS, INC.

Defendant

Date: March 24, 2022

Date: March 24
Time: 8:00 a.m.

Time: 8:00 a.m.

Place: Courtroom 12, 13
Judge: Hon. William Alsop

Complaint Filed: September 28, 2020

DECL. OF MOSS ISO SONOS'S MOT. FOR LEAVE TO
AMEND INFRINGEMENT CONTENTIONS PURSUANT TO

PATENT L. R. 3-6

3:20-cv-06754-WHA

1 I, Geoffrey Moss, declare as follows and would so testify under oath if called upon to do
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing
5 of the Bar of the State of California. I make this declaration based on my personal knowledge,
6 unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

7 2. I make this declaration in support of Sonos’s Motion for Leave to Amend its
8 Infringement Contentions Pursuant to Patent L.R. 3-6.

9 3. On January 10, 2022, pursuant to Patent Local Rule 4-2, the parties exchanged
10 their proposed constructions for claim terms identified by the parties in their Patent Local Rule 4-
11 exchange. In its Patent Local Rule 4-2 disclosure, Google set forth its proposed constructions of
12 “resource locators” and “local playback queue on the particular playback device” found in the
13 asserted claims of the ’615 Patent.

14 4. Thereafter, I participated in a review of the source code of the accused Google
15 products on the following dates: January 12, January 13, January 14, January 18, January 19,
16 January 31, February 1, February 2, February 3, February 4, and February 7.

17 5. Attached as **Exhibit 1** is a true and correct copy of Sonos’s proposed Amended
18 Infringement Contentions with redlines to reflect Sonos’s proposed changes.

19 6. Attached as **Exhibit 2** is a true and correct copy of a February 4, 2022, email
20 communication from Cole Richter, counsel for Sonos, to Nima Hefazi, counsel for Google.

21 I declare under penalty of perjury that the foregoing is true and correct to the best of my
22 knowledge. Executed this 7th day of February, 2022 in Los Angeles, California.

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GEOFFREY MOSS